

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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MARK A. CAMPBELL A/K/A NICOLE  
ROSE CAMPBELL,

Plaintiff,

v.

Case No. 16-cv-261-jdp

KEVIN KALLAS et al.,

Defendant.

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**PROPOSED STIPULATED FACTS**

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Plaintiff and Defendants, by their respective attorneys, respectfully submit the following Proposed Stipulated Facts (“PSF”) in support of their respective Motions for Summary Judgment.

**PARTIES**

1. Plaintiff Mark A. Campbell a/k/a Nicole Rose Campbell is a citizen of Wisconsin currently housed at Racine Correctional Institution, located at 2019 Wisconsin St., Sturtevant, WI 53177.
2. All Defendants are residents of Wisconsin and adult citizens of the United States.
3. At all relevant times, all Defendants acted under color of law while they were employed by the Wisconsin Department of Corrections (“DOC”).
4. Defendant Dr. Kevin Kallas is a board certified psychiatrist and is currently employed as the Mental Health Director for the DOC.
5. Defendant Dr. Jeffrey Anders is employed as the Psychiatry Director of the DOC.
6. Defendant Dr. Gary Ankarlo was employed by the DOC until September 2016.

7. Defendant James Greer is employed as the Bureau Director of the DOC Bureau of Health Services.

8. Defendant Robert Hable was employed by the DOC. His last position was DOC Deputy Warden for Oshkosh Correctional Institution

9. Defendant Dr. Ryan Holzmacher was employed as the Medical Director of the DOC Bureau of Health Services until May 2017.

10. Defendant Cathy Jess is currently employed as DOC Deputy Secretary and was previously the Administrator of the DOC Division of Adult Institutions.

11. Defendant Mary Muse is employed as the Nursing Director of the DOC Bureau of Health Services.

12. Defendant Cindy O'Donnell is employed as the designee of the Secretary of the DOC.

13. Defendant Mark Weisgerber is employed as the Security Chief of the DOC.

#### **JURISDICTION AND VENUE**

14. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, as this action arises under the laws and Constitution of the United States, and 28 U.S.C. § 2201, as an actual controversy exists within this Court's jurisdiction.

15. The Court has personal jurisdiction over all parties.

16. Venue is proper in the Western District of Wisconsin pursuant to 28 U.S.C. § 1331, because the majority of the events giving rise to this action occurred in this district and because Defendants are subject to personal jurisdiction in this district.

#### **BACKGROUND RELATING TO GENDER DYSPHORIA**

17. Campbell is a transgender woman: her gender identity is female but she was assigned the male sex at birth.

18. Many transgender individuals experience distress due to the incongruity between their gender identity and physical body. At an acute level, this distress becomes a mental health diagnosis known as gender dysphoria.

19. In 2013, the diagnosis of gender identity disorder was renamed “gender dysphoria.”

20. Gender dysphoria is a serious medical need.

21. Treatment for gender dysphoria varies depending on the individual and can include one or more of the following: counseling and psychotherapy, changes in gender expression and role, hormone therapy, sex reassignment surgery (“SRS”), breast enlargement, voice therapy, hair removal, and/or potentially other accommodations.

22. SRS is also known as “gender confirmation surgery.”

23. SRS for a male-to-female transgender individual usually includes multiple surgical procedures performed at the same time. Among those procedures is vaginoplasty.

Dated this 9th day of February, 2018.

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